

United States Department of the Interior

BUREAU OF RECLAMATION

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Mr. Chuck Clarke Regional Administrator U.S. Environmental Protection Agency 1200 Sixth Avenue Seattle WA 98101-1128

Subject: Effects of Grand Coulee Dam Operation on Water Quality

Dear Mr. Clarke:

This letter is in response to your November 2, 1998, letter cosigned by Tom Fitzsimmons and Gary Passmore regarding our meeting on July 23, 1998. At that meeting we discussed Clean Water Act issues associated with Grand Coulee Project operations.

We concur with your description of responsibilities of Federal, state, and tribal water quality agencies, as described in your letter. Reclamation is committed to meet water quality standards to the extent practicable. We would like to stress, however, that under unusual or extenuating circumstances, it may not be possible to avoid contributing to dissolved gas problems downstream of Grand Coulee Dam with existing structural, operational, and funding constraints.

In follow up to agreements reached in our July 23, 1998 meeting, Reclamation developed a list of issues to discuss with the U.S. Army Corps of Engineers (COE) and Bonneville Power Administration (BPA) at the Action Agency meeting in September 1998. This list was shared with Colville Confederated Tribes (CCT), Ecology (DOE), and Environmental Protection Agency (EPA) staff prior to the meeting.

The Action Agencies engaged in discussions of dissolved gas issues at their September 9, 1998 meeting. There was agreement that there may be opportunities for system operations changes and an isolated, combined Chief Joseph/Grand Coulee gas management option. However, there is a reluctance to proceed outside the context of a system-wide study of structural and operational alternatives.

The Federal agencies have developed a caucus group consisting of senior staff members. Their role is to coordinate a unified position for the "Federal family." We understand Mr. Phil Milam

of EPA is to chair a subgroup that will deal with Clean Water Act issues. We support the caucus concept and believe the appropriate way to coordinate the gas management issues is through Mr. Milam's subgroup. Reclamation will coordinate a follow-up meeting with the CCT and DOE after the Federal position is defined.

Project specific spill caps and system spill priorities are adopted in annual water management plans developed within the regional forum. Reclamation submitted proposed changes to Grand Coulee spill caps which establish separate caps for outlet works and drum gate spills for consideration in the December 1999 Dissolved Gas Team meeting. Implementation of these spills caps would enhance system-wide capability to manage total dissolved gas. EPA, CCT, and DOE may have input to decisions regarding 1999 spill caps and spill priorities through participation in further discussions and review of the 1999 Total Dissolved Gas Management Plan conducted in Dissolved Gas Team and Technical Management Team forums.

Reclamation staff have met with staff of the Colville Confederated and Spokane Tribes to gather their views regarding duties which could be assumed by a biologist or environmental specialist at the Grand Coulee Project. Tribal input will be considered in making future staffing decisions.

Reclamation remains committed to working within existing regional forums to identify, evaluate, and prioritize actions to reduce the effects of Grand Coulee Dam operations on water quality in the Columbia River system. Working with EPA, CCT, and DOE in existing regional forums would assist development of an integrated approach to Endangered Species Act and Clean Water Act resource management.

Sincerely,

Steven R. Clark

Acting Regional Director